UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

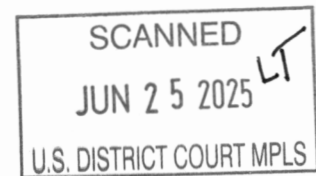|	
MATTHEW D. GUERTIN	Case No: 25-cv-__2670-JWB/DLM__
Plaintiff,	
v.	
TIM WALZ, Governor of Minnesota;	**RECEIVED** JUN 2 5 2025 CLERK, U.S. DISTRICT COURT MINNEAPOLIS, MINNESOTA
KEITH ELLISON, Minnesota Attorney General;	
HENNEPIN COUNTY, a municipal entity;	
MARY MORIARTY, Hennepin County Attorney;	
JUDITH COLE, Sr. Assistant Hennepin County Attorney;	
MICHAEL BERGER, Chief Public Defender, Hennepin County;	
KERRY W. MEYER, Chief Judge, 4th District;	
BRUCE M. RIVERS, Private Defense Counsel;	**EXPERT WITNESS** **DECLARATION PURSUANT** **TO FED. R. EVID. 702 & 902(14)**
CHELA GUZMAN-WIEGERT, Assistant County Administrator;	
ALISHA NEHRING, MN Department of Health Attorney;	
HILARY CALIGIURI, Presiding Criminal Judge, 4th District;	
TODD FELLMAN, Presiding Juvenile Judge, 4th District;	SCANNED JUN 2 5 2025 LT U.S. DISTRICT COURT MPLS
SARAH HUDLESTON, Judge, 4th District;	
WILLIAM H. KOCH, Judge, 4th District;	
JULIA DAYTON-KLEIN, Judge, 4th Judicial District;	
DANIELLE C. MERCURIO, Judge, 4th Judicial District;	
GEORGE F. BORER, Referee, 4th Judicial District;	

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LEE CUELLAR,
Judicial Clerk, 4th District;

MAWERDI HAMID,
Assistant Hennepin County Attorney;

JACQUELINE PEREZ,
Assistant Hennepin County Attorney;

EMMETT M. DONNELLY,
Hennepin County Public Defender;

RAISSA CARPENTER,
Hennepin County Public Defender;

SHEREEN ASKALANI,
Judge, 4th District;

DR. JILL ROGSTAD,
Senior Clinical Forensic Psychologist;

DR. ADAM MILZ,
Hennepin County Psychological Services;

DR. KATHERYN CRANBROOK,
Hennepin County Psychological Services;

DR. KRISTEN A. OTTE,
Hennepin County Psychological Services;

MICHAEL K. BROWNE,
Judge, 4th District;

LISA K. JANZEN,
Judge, 4th District;

CAROLINA A. LAMAS,
Judge, 4th District;

JOHN DOES 1–50;

JANE DOES 1–50,

Defendants.

I.   AFFIDAVIT OF MATTHEW DAVID GUERTIN

I, Matthew David Guertin, hereby declare and affirm under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

I am the undersigned Plaintiff in this action and submit this sworn affidavit in support of my Complaint and forthcoming Emergency Motion for Temporary Restraining Order.

I am also the original compiler, analyst, and author of the digital forensic evidence set that forms the backbone of this action. This dataset includes more than 3,600 PDF court records obtained directly from the Minnesota Court Records Online (MCRO) system, along with accompanying metadata spreadsheets, object-level audit tables, and structured forensic reports.

II. IDENTITY AND PROFESSIONAL BACKGROUND

For two decades I have worked at the intersection of digital media, graphic design, lighting design, computer programming, and large-scale show-control systems.

My portfolio (www.MattGuertin.com) documents projects ranging from a 50-foot projection-mapped falcon for UNESCO Diriyah to main-stage visual systems, and large-scale production designs for Coachella and Ultra Music Festival.

Although not a licensed P.E., I have repeatedly been credited as the lead system engineer or designer in national trade press and was granted U.S. Patent No. 11,577,177 for the InfiniSet omnidirectional treadmill system on February 14, 2023.

III. RELIABILITY OF MY OPINIONS

Digital-forensic examination is governed by verifiable processes, not by licensure. Because every intermediate artifact in my workflow is hash-locked, any qualified examiner can reproduce my results—self-validating the work.

My professional experience designing high-integrity control networks (Crestron®, BlackTrax®, Touchdesigner®) necessarily includes a high level of technical proficiency in computers, software, programming, and object-level debugging. These same skills translate directly to evidentiary PDF forensics.

IV. METHODOLOGY (APPLIED INDUSTRY & NIST STANDARDS)

On April 29-30, 2024, I performed a script assisted download of every PDF and the corresponding HTML docket for each of the 163 cases, using a secure connection.

Total: 3,629 PDFs / 8,794 pages.

Using muPDF mutool I extracted every embedded object (images, Xobjects, fonts). Each object was independently hashed, permitting cross-file duplicate detection that cannot be produced by mere filename coincidence.

My workflow follows the NIST "Guide to Integrating Forensic Techniques into Incident Response" (SP 800-86) and SWGDE "Digital & Multimedia Evidence" recommendations: repeatable steps, hash-verified inputs/outputs, contemporaneous logs.

While I did not hash the documents at the time of download, the entire dataset is independently verifiable and self-authenticating — not by my own declaration alone, but through the court's own cryptographic digital seals.

V. THE COURT DIGITALLY CERTIFIED ITS OWN MISCONDUCT

A forensic sweep of all 3,629 MCRO PDFs confirms that 3,613 of them (99.6%) still contain the original X.509 SHA-256 digital signature issued by the Hennepin County District Court's e-filing system. These signatures:

- Cryptographically certify each file as unchanged since the moment it was entered into the court's system;

- Would automatically be invalidated if the document had been altered in any way post-publication;

- Provide a chain-of-custody guarantee far more reliable than user-generated hashes, because the signatures originate from the court itself.

- The 16 unsigned PDFs — which are fully catalogued in a separate exhibit — stand out as statistical anomalies and support, rather than weaken, the conclusion that the remaining dataset is forensically intact and court-authenticated.

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Through the analysis of these digitally signed court records, I uncovered:

- Evidence of mass-fabricated "Findings of Incompetency" orders, cloned across 127 unrelated cases;

- The deliberate embedding of hidden font file fingerprints (.ttf/.cff) linking my own court records to a synthetic case network;

- Dozens of fake USPS 'Returned Mail' filings, confirmed through duplicate image hash matches and falsified envelope scans;

- Judicial signature and timestamp duplication across hundreds of files — some of which were signed after their supposed filing dates;

- A system of AI-generated, image-based PDFs embedded into the official court record under the guise of legitimate court orders.

VI.   EVERY SINGLE CLAIM OF MINE IS ALREADY PROVEN

Every claim presented in my Complaint is supported by digitally verifiable evidence, not by hearsay or subjective allegations. The court itself, through its automated cryptographic signature system, has inadvertently vouched for the authenticity of the very documents proving the fraud.

I am not only the compiler of this forensic archive — I am also the target of the fabricated court filings, giving me unique insight into both the structural mechanics of the fraud and its real-world impact. My findings are not speculative: they are demonstrable, repeatable, and rooted in cryptographic proof.

VII.   SWORN STATEMENT OF FACT AND SIGNATURE

I submit this affidavit as both an expert witness declaration and as a sworn affirmation that the digital forensics underlying this action meet, and exceed, the standards of authentication and admissibility set forth in federal evidentiary law.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 25th day of June, 2025, in Hennepin County, Minnesota.

Dated: June 25, 2025   *Respectfully submitted,*

                                              /s/ Matthew D. Guertin

                                              Matthew David Guertin
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